

July 20, 2023

VIA ECF

Honorable Douglas E. Arpert, U.S.M.J.
United States District Court, New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Courtroom 6W
Trenton, New Jersey 08608

**RE: *Sugg v. Virtusa Corp.*, No.: 3:18-cv-08036-MAS-DEA
Joint Letter Regarding ESI Discovery and Requesting Adjournment of
July 21, 2023 Status Conference**

Dear Judge Arpert:

The parties write jointly to update Your Honor regarding the status of ESI discovery. Following the July 5, 2023 status conference (*see* Dkt. 88), the parties met and conferred regarding the seven search terms Plaintiff wished to be run on the eleven ESI custodians as part of the next step for incremental ESI discovery. Plaintiffs proposed modifications to two search terms with the highest hit counts, which resolved the parties' dispute. Virtusa has agreed to run the following search terms on the eleven ESI custodians and to produce responsive documents on or before September 18, 2023.

1. Margin /25 (visa OR H1B OR "H-1B" OR L1 OR "L-1" OR rotat! OR replac! OR "ATC onsite" OR "N-1")
2. (Rotat! OR replac!) /25 (visa OR H1B OR "H-1B" OR L1 OR "L-1" OR onsite OR ATC OR "N-1")
3. (CPC /5 (improv! OR optimiz! OR initiative OR reduc!)) AND (visa OR H1B OR "H-1B" OR L1 OR "L-1" OR "ATC onsite" OR McKinsey)
4. McKinsey AND (visa OR "ATC onsite" OR "travel ready" OR assignee)
5. (EY OR Ernst) AND (visa OR "ATC onsite" OR "travel ready" OR assignee)
6. "travel readiness"
7. Initiative /10 "ATC onsite"

granted The parties respectfully request that the Court adjourn the July 21, 2023 telephonic status conference, and set a November deadline for the parties to confer and propose a schedule for this case moving forward.

by November 1, 2023

*So Ordered -
Issued 7/20/23*

Respectfully submitted,

/s/ Daniel Kotchen

Daniel Kotchen (*pro hac vice*)

Lindsey Grunert (*pro hac vice*)

KOTCHEN & LOW LLP

1918 New Hampshire Ave. NW

Washington, DC 20009

Telephone: (202) 468-4014

Facsimile: (202) 280-1128

dkotchen@kotchen.com

lgrunert@kotchen.com

/s/ Jonathan Rudnick, Esq.

**LAW OFFICES OF JONATHAN
RUDNICK, LLC.**

788 Shrewsbury Avenue

Tinton Falls, NJ 07724

jonr@jonrudlaw.com

Attorneys for Class Plaintiff

/s/ Peter O. Hugues

Peter O. Hughes, Esq.

Christopher Pace

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

10 Madison Avenue, Suite 400

Morristown, New Jersey 07960

Telephone: (973) 656-1600

Facsimile: (973) 656-1611

Peter.Hughes@ogletreedeakins.com

Chris.Pace@ogletreedeakins.com

Attorneys for Defendant